

**United States District Court  
Southern District of Texas  
Houston Division**

**Supplemental Civil Cover Sheet for Cases Removed  
From State Court**

**This form must be attached to the Civil Cover Sheet at the time the case is filed in the U.S. District Clerk's Office. Additional sheets may be used as necessary.**

**1. State Court Information:**

Please identify the court from which the case is being removed and specify the number assigned to the case in that court.

<u>Court</u>	<u>Case Number</u>
334 <sup>th</sup> Judicial District Harris County, Texas	2019-19904

**2. Style of the Case:**

*Jacolby Moore v. Fitness International, LLC*

Please include all Plaintiff(s), Defendant(s), Intervenor(s), Counterclaimant(s), Crossclaimant(s) and Third Party Claimant(s) still remaining in the case and indicate their party type. Also, please list the attorney(s) of record for each party named and include their bar number, firm name, correct mailing address, and phone number (including area code.)

**Party and Party Type**

**Plaintiff:**

*Jacolby Moore*

**Attorney(s):**

Mr. Kenneth R. Baird

State Bar No. 24036172

Email: [kbaIRD@bairdlawfirm.net](mailto:kbaIRD@bairdlawfirm.net)

THE BAIRD LAW FIRM

2323 South Voss Road, Suite 325

Houston, Texas 77057

713/783-1113 (office)

281/677-4227 (telecopier)

**Defendant:**  
*Fitness International, LLC*

**Attorney(s):**  
Douglas D. Fletcher  
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**3. Jury Demand:**

Was a Jury Demand made in State Court? Yes

If "Yes," by which party and on what date? Plaintiff  
on March 19, 2019

**4. Answer:**

Was an Answer made in State Court? Yes

If "Yes," by which party and on what date? Defendant  
On April 3, 2019

**5. Unserved Parties:**

The following parties have not been served at the time this case was removed:

<u>Party</u>	<u>Reason(s) for No Service</u>
N/A	

**6. Nonsuited, Dismissed, or Terminated Parties:**

Please indicate any changes from the style on the State Court papers and the reason for that change:

<u>Party</u>	<u>Reason</u>
N/A	

**7. Claims of the Parties:**

The filing party submits the following summary of the remaining claims of each party in this litigation:

<u>Party</u>	<u>Claim(s)</u>
<b>Plaintiff:</b> <i>Jacolby Moore</i>	Plaintiff asserts personal injury claims against Defendant based on an alleged premises defect while Plaintiff was working as a lifeguard on December 9, 2018.
<b>Defendant:</b> <i>Fitness International, LLC</i>	Defendant does not seek any affirmative relief.

Respectfully submitted,

**FLETCHER, FARLEY, SHIPMAN  
& SALINAS, L.L.P.**

BY: /s/Douglas D. Fletcher  
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**ATTORNEYS FOR DEFENDANT FITNESS  
INTERNATIONAL, LLC d/b/a LA FITNESS**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing instrument was electronically filed via the Court's CM/ECF system and a true and correct copy of same was delivered to all counsel of record in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on this the 8<sup>th</sup> day of April 2019.

/s/Douglas D. Fletcher  
**DOUGLAS D. FLETCHER**